

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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COLLEEN M. DELANEY, :
Plaintiff, :
: against- : No. 1:19-cv-04085 (LAP)
THOMAS FORTUNE FAY et al., :
Defendants. :
:
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NOTICE OF DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss Plaintiff's Complaint and the Rothenberg Defendants' Supplemental Memorandum of Law in Support of Motion to Dismiss, dated July 12, 2019, and such other papers and proceedings as may be filed or had herein, Defendants Thomas Fortune Fay, Fay Law Group, P.A., Steven R. Perles, Perles Law Firm, P.C., Allen L. Rothenberg, The Rothenberg Law Firm, LLP, and Fay and Perles FSIA Litigation Partnership, by and through undersigned counsel, hereby move this Court, before the Honorable Loretta A. Preska, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 12A, New York, New York 10007, at a date and time to be determined by the Court, for an order dismissing Plaintiff's Complaint with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6), and granting such other and further relief as the Court deems appropriate.

Dated: July 12, 2019

/s/ Caroline A. Morgan

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Respectfully submitted,

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